



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/RCH/EMR/PP/MD
F. #2019R00927

271 Cadman Plaza East
Brooklyn, New York 11201

February 14, 2022

By ECF

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna
Criminal Dkt. No. 19-576 (BMC)

Dear Judge Cogan:

The parties respectfully submit this written status update to the Court in the above-captioned matter. The parties respectfully request that the Court adjourn the upcoming status conference scheduled for February 16, 2022 for three weeks and respectfully request a date of either March 3, 2022 and March 4, 2022. The parties agree that an order of excludable delay is appropriate based on the Court's previous complex case designation in this matter.

In addition, the parties respectfully write to update the Court on the following issue:

- Discovery
 - The government continues the process of collecting and reviewing discovery for production to the defendant on a rolling basis. Following the parties' last status letter on December 15, 2021, the government made an additional discovery production on February 11, 2022, totaling more than 64,000 pages of documents. See Dkt. No. 83.
 - The government also is awaiting responses from outstanding subpoenas. In addition, the government has submitted MLAT requests for foreign evidence. Although the government has received some responsive information, it is awaiting additional MLAT responses.
 - To date, the government has produced more than 1 million pages of documents and records. The government has produced the vast majority of the discoverable

material in its possession. It expects to make smaller productions on a rolling basis as it receives additional discoverable materials and/or identifies such material in its possession.

- Trial Schedule
 - Prior to the next status conference, the parties intend to confer regarding a proposed pre-trial schedule for any necessary motions, disclosure of material pursuant to 18 U.S.C. § 3500, juror questionnaires, and any other necessary matters. Upon an agreement of the parties, the parties will advise the Court accordingly of a proposed schedule.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Cesar de Castro, Esq. (by ECF)
Clerk of the Court (BMC) (by ECF)